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DUE TO THE QUALITY OF THE ORIGINAL

COUNTY OF LOS ANGELES,	STATE OF CALIFORNIA
ARRAIGNME	ENT DATE: JULY 25, 1985 Div 81, 8:30 a.i.
The People of the State of California,) Plaintiff,)	•
vs.	MISDEMEANOR COMPLAINT SFUND RECORDS CTR. 107025
	Filed
BUILDERS HARDWARE FINISHERS, INC. JOE N. DURAN, PRESIDENT, CO-DEFT.,	CLARK K. SAITO, Clerk
(SEX: Male; DOB: 5-16-48) By
	Deputy Clerk
	Issued By
	By STEVEN R. TEKOSKY
	Deputy City Attorney
H&S \$25189.5(b); LAMC\$64.30B-2a	

Comes now the undersigned and states that he is informed and believes, and upon such information and belief declares: That on or about October 2, 1984, at and in the City of Ios Angeles, in the County of Ios Angeles, State of California, a misdemeanor to wit:

violation of CALIFORNIA HEALTH & SAFETY CODE §25189.5(b)
was committed by BUILDERS HARDWARE FINISHERS INC.

BUILDERS HARDWARE FINISHERS, INC. JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, knowingly dispose of hazardous or extremely hazardous waste, and cause any such waste to be disposed of at a facility which does not have a permit from the Department issued pursuant to the provisions of Chapter 6.5 of Division 20 of the Health & Safety Code and at any point which is not authorized according to the provisions of said chapter.

COUNT 2

For a further, separate and 2nd cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Count 1 hereof, affiant complains and says: That on or about the 17 day of October 1984, at and in Los Angeles City, in the County of Los Angeles, State of California, a misdemeanor to wit:

violation of CALIFORNIA HEALTH & SAFETY CODE § 25189.5(b)

was committed by Builders Hardware Finishers, Inc. JUE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid, did unlawfully at 1846 Sichel Street, Los Angeles, California, knowingly dispose of hazardous or extremely hazardous waste, and cause any such waste to be disposed of at a facility which does not have a permit from the Department issued pursuant to the provisions of Chapter 6.5 of Division 20 of the Health & Safety Code and at any point which is not authorized according to the provisions of said chapter.

Re: BUILDERS HARDWARE FINISHERS, INC. Page __2_

COUNT 3

For a further, separate and 3rd cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-2 hereof, affiant complains and says: That on or about the 24th day of October 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of CALIFORNIA HEALTH & SAFETY CODE § 25189.5(b)

was committed by BUILDERS HARDWARE FINISHERS, INC.
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, knowingly dispose of hazardous or extremely hazardous waste, and cause any such waste to be disposed of at a facility which does not have a permit from the Department issued pursuant to the provisions of Chapter 6.5 of Division 20 of the Health & Safety Code and at any point which is not authorized according to the provisions of said chapter.

COUNT 4

For a further, separate and 4th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-3 hereof, affiant complains and says: That on or about the 25th day of October 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of CALIFORNIA HEALTH & SAFETY CODE § 25189.5(b)

was committed by Builders Hardware Finishers, Inc. JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid.

did unlawfully at 1846 Sichel Street, Los Angeles, California, knowingly dispose of hazardous or extremely hazardous waste, and cause any such waste to be disposed of at a facility which does not have a permit from the Department issued pursuant to the provisions of Chapter 6.5 of Division 20 of the Health & Safety Code and at any point which is not authorized according to the provisions of said chapter.

Re: Builders HARDWARE FINISHERS, INC. Page 3

COUNT 5

For a further, separate and 5th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-4 hereof, affiant complains and says: That on or about the 5th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of CALIFORNIA HEALTH & SAFETY CODE § 25189.5(b)

was committed by BUILDERS HARDWARE FINISHERS, INC.
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, knowingly dispose of hazardous or extremely hazardous waste, and cause any such waste to be disposed of at a facility which does not have a permit from the Department issued pursuant to the provisions of Chapter 6.5 of Division 20 of the Health & Safety Code and at any point which is not authorized according to the provisions of said chapter.

COUNT 6

For a further, separate and 6th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-5 hereof, affiant complains and says: That on or about the 10th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of CALIFORNIA HEALTH & SAFETY CODE § 25189.5(b)

was committed by BUILDERS HARDWARE FINISHERS, INC.
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, knowingly dispose of hazardous or extremely hazardous waste, and cause any such waste to be disposed of at a facility which does not have a permit from the Department issued pursuant to the provisions of Chapter 6.5 of Division 20 of the Health & Safety Code and at any point which is not authorized according to the provisions of said chapter.

Re: Builders Hardware Finishers, Inc. Page 4

COUNT 7

For a further, separate and 7th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-6 hereof, affiant complains and says: That on or about the 11th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of CALIFORNIA HEALTH & SAFETY CODE § 25189.5(b)

was committed by BUILDERS HARDWARE FINISHERS, INC.
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid.

did unlawfully at 1846 Sichel Street, Los Angeles, California, knowingly dispose of hazardous or extremely hazardous waste, and cause any such waste to be disposed of at a facility which does not have a permit from the Department issued pursuant to the provisions of Chapter 6.5 of Division 20 of the Health & Safety Code and at any point which is not authorized according to the provisions of said chapter.

COUNT 8

For a further, separate and 8th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-7 hereof, affiant complains and says: That on or about the 10th day of December 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of CALIFORNIA HEALTH & SAFETY CODE § 25189.5(b)

was committed by BUILDERS HARDWARE FINISHERS, INC.
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, knowingly dispose of hazardous or extremely hazardous waste, and cause any such waste to be disposed of at a facility which does not have a permit from the Department issued pursuant to the provisions of Chapter 6.5 of Division 20 of the Health & Safety Code and at any point which is not authorized according to the provisions of said chapter.

CCUNT 9

For a further, separate and 9th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-8 hereof, affiant complains and says: That on or about Oct. 24 to Oct. 25, 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 10

For a further, separate and 10th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-9 hereof, affiant complains and says: That on or about the 24th day of October 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

COUNT 11

For a further, separate and 11th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-10 hereof, affiant complains and says: That on or about the 25th day of October 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 12

For a further, separate and 12th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-11 hereof, affiant complains and says: That on or about the 29th day of October 1984_, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

COUNT 13

For a further, separate and 13th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-12 hereof, affiant complains and says: That on or about the 30th day of October 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid.

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 14

For a further, separate and 14th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-13 hereof, affiant complains and says: That on or about the 31st day of October 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

COUNT 15

For a further, separate and 15th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-14 hereof, affiant complains and says: That on or about the 1st day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;

JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 16

For a further, separate and 16th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-15 hereof, affiant complains and says: That on or about the 5th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.; JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

COUNT 17

For a further, separate and 17th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-16 hereof, affiant complains and says: That on or about the 5th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 18

For a further, separate and $_{18 \, {
m th}}$ cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-17 hereof, affiant complains and says: That on or about the 5th day of November $_{1984}$, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.: JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

Page 10

CCUNT 19

For a further, separate and 19th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-18 hereof, affiant complains and says: That on or about the 6th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;

JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 20

For a further, separate and 20th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-19 hereof, affiant complains and says: That on or about the 7th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.; JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

COUNT 21

For a further, separate and 21st cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-20 hereof, affiant complains and says: That on or about Nov. 10th to Nov. 11, 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;

JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 22

For a further, separate and 22nd cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-21 hereof, affiant complains and says: That on or about the 12th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.; JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

CCUNT 23

For a further, separate and 23rd cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-22 hereof, affiant complains and says: That on or about the 13th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 24

For a further, separate and 24th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-23 hereof, affiant complains and says: That on or about the 15th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by Builders Hardware Finishers, Inc.; JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

COUNT 25

For a further, separate and 25th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-24 hereof, affiant complains and says: That on or about the 17th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;
JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid.

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 26

For a further, separate and 26th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1- 25 hereof, affiant complains and says: That on or about the 17th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.; JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

COUNT 27

For a further, separate and 27th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-26 hereof, affiant complains and says: That on or about the 20th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;

JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 28

For a further, separate and 28th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-27 hereof, affiant complains and says: That on or about the 28th day of November 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.; JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

COUNT 29

For a further, separate and 29th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-28 hereof, affiant complains and says: That on or about the $^{4\text{th}}$ day of December 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.;

JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid,

did unlawfully at 1846 Sichel Street, Los Angeles, California, introduce wastewater to the publicly owned treatment works that exceeds the allowable limitations as set forth in Los Angeles Municipal Code Section 64.30B (2) (a).

COUNT 30

For a further, separate and 30th cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-29 hereof, affiant complains and says: That on or about the 5th day of December 1984, at and in Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit:

violation of LOS ANGELES MUNICIPAL CODE SECTION 64.30 B(2) (a)

was committed by BUILDERS HARDWARE FINISHERS, INC.; JOE N. DURAN, PRESIDENT, Co-Deft.

(whose true name to affiant is unknown), who at the time and place last aforesaid.

All of which is contrary to the law and against the peace and dignity of the People of the State of California. Declarant and complainant therefore prays that a warrant may be issued for the arrest of said defendant(s) and that said defendant(s) may be dealt with according to law.

Attached hereto and incorporated herein by reference as though fully set forth are written statements and reports, which constitute the basis upon which I make the within allegations.

A Declaration in Support of the Issuance of Such Warrant is Submitted.

Executed at Los Angeles, California, on June /7 , 1985

I declare under penalty of perjury that the foregoing is true and correct.

NORM COTTER

WILLIAM JONES

Declarant and Complainant

Declarant and Complainant Chief Industrial Waste Inspector II Los Angeles City Bur. of Sanitation

Industrial Hygienist Los Angeles County Dept. of Health Service

ARRAIGNMENT DATE:

JULY 25, 1985 DIVISION 81 8:30 A.M.